

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST INC.'S
OBJECTIONS TO REPORT AND RECOMMENDATION OF THE SPECIAL
MASTER [DKT. 377]**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Objections to the Report and Recommendation of the Special Master (Dkt. 377). I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Samsung’s 11/20/2023 Supplemental Objections and Responses to Netlist’s Amended First Set of Interrogatories.

3. Attached as **Exhibit 2** is a true and correct copy of Netlist’s First 30(b)(6) Notice of Deposition dated October 19, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of the December 21, 2022 deposition of Junseon Yoon.

5. Attached as **Exhibit 4** is a true and correct copy of an email from counsel for Netlist to counsel for Samsung dated November 1, 2023.

6. Attached as **Exhibit 5** is a true and correct copy of the November 29, 2022 deposition transcript of Hyun Lee.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 8, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby